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MEMORANDUM ENDORSED

February 28, 2024

Hon. Gregory H. Woods
Judge, United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

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Re: *United States v. James Kelly*, 23 Cr. 113 (GHW)

Dear Judge Woods,

I am co-counsel to Michael Bradley on the above matter and write to the court regarding the March 11, 2024, trial date in this matter. Unfortunately, I am unable to proceed to trial on this matter on March 11, 2024. I had informally informed Judge Ho's courtroom deputy and also informed the government of the same more than a week ago. The case having been re-assigned to this Honorable Court, I now submit this letter and provide an explanation.

I have had to take on a larger role in the trial of *United States v. Hernandez*, 15 Cr. 379 (PKC), as I am the only cleared counsel on that case. [REDACTED]

[REDACTED] Additionally, the lead lawyer on the matter has on-going and serious medical issues. I had no way to anticipate this happening and I certainly did not anticipate falling ill. I deeply apologize for any inconvenience caused to the Court or the parties. I genuinely regret the consequences of my unavailability. For these reasons, I ask the court to either adjourn the trial date or relieve me as trial counsel in this matter and assign substitute co-counsel to assist Mr. Bradley. The government is represented by three lawyers in this matter.

Respectfully submitted,

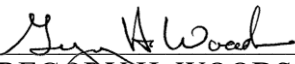
/s/ Sabrina Shroff

The Court will hold a conference to discuss Defendant's February 28, 2024 letter, Dkt. No. 97, on March 4, 2024 at 9:00 a.m. The conference will be conducted in Courtroom 12C, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007. The Government is ordered to produce Mr. Kelly for that date and time.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 97.

SO ORDERED.

Dated: February 29, 2024
New York, New York



GREGORY H. WOODS
United States District Judge